

**IOWA DEPARTMENT OF NATURAL RESOURCES
ADMINISTRATIVE CONSENT ORDER**

IN THE MATTER OF: GKN ARMSTRONG WHEELS, INC. Emmet County, Iowa	ADMINISTRATIVE CONSENT ORDER NO. 2010-AQ- 55
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TO: Corporation Service Company, Registered Agent
GKN Armstrong Wheels, Inc.
505 5th Avenue, Suite 729
Des Moines, Iowa 50309

Kevin Smith, Environmental Coordinator
GKN Armstrong Wheels, Inc.
5453 6th Avenue
Armstrong, Iowa 50514-7573

I. SUMMARY

This administrative consent order is entered into between the Iowa Department of Natural Resources (DNR) and GKN Armstrong Wheels, Inc. (GKN) for the purpose of resolving numerous air quality violations which occurred at its facility in Armstrong, Iowa. In the interest of avoiding litigation, the parties have agreed to the provisions below.

Questions regarding this administrative consent order should be directed to:

Relating to technical requirements:

Bryan Bunton, Air Quality
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, Iowa 50324
Phone: 515/281-0363

Relating to legal requirements:

Kelli Book, Attorney for the DNR
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, Iowa 50324
Phone: 515/281-8563

Payment of penalty to:

Iowa Department of Natural Resources
Henry A. Wallace Building
502 East Ninth Street
Des Moines, Iowa 50319-0034

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II. JURISDICTION

Pursuant to the provisions of Iowa Code sections 455B.134(9) and 455B.138(1) which authorize the Director to issue any order necessary to secure compliance with or prevent a violation of Iowa Code chapter 455B, Division II (air quality), and the rules promulgated or permits issued pursuant to that part and Iowa Code section 455B.109 and 567 Iowa Administrative Code (IAC) chapter 10, which authorize the Director to assess administrative penalties, DNR has jurisdiction to issue this administrative consent order.

III. STATEMENT OF FACTS

GKN neither admits nor denies the Statement of Facts and enters into this administrative consent order for settlement purposes only.

1. GKN is part of a larger company named GKN OffHighway, which employs over 4,500 people and has 27 facilities worldwide. There are two GKN facilities in Iowa, located in Armstrong and Estherville. The Iowa facilities manufacture agricultural and industrial wheels, rims, hubs, and spindles. This administrative consent order is for the Armstrong facility only. The Armstrong facility employs approximately 365 people. Emission sources at this facility include MIG welders, top coat booths, top coat ovens, e-coat washers, e-coat ovens, coating systems, rim lines, and auto welders. The facility has numerous air quality construction permits as well as a Title V Operating Permit. This administrative consent order is being entered into to address Title V Operating Permit violations, the air quality construction permit violations, and violations of 40 Code of Federal Regulations (CFR) 63, Subpart M, *National Emissions Standards for Hazardous Air Pollutants* (NESHAP) for Surface Coating of Miscellaneous Metal Parts & Products (Subpart M) over the course of the past nine years.

Title V Operating Permit

2. On April 14, 1999, DNR issued GKN Title V Operating Permit #99-TV-020. The issuance of the Title V Operating Permit triggered various reporting and fee requirements associated with the Title V program. Among other requirements, the Title V Operating Permit included the following requirements:

- Section IV. General Conditions. G2 – Permit Expiration.
(Pursuant to 567 IAC 22.105(1)"a").

The expiration of the permit terminates the permittee's right to operate unless a timely and complete application has been submitted for renewal. Each source applying for a renewal of its Title V Operating Permit is required to submit an application at least six months but not more than 18 months prior to the date of the permit expiration.

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- Section IV. General Conditions. G4 – Annual Compliance Certification.
(Pursuant to 567 IAC 22.108(15)"e").

By March 31 of each year, the permittee shall submit compliance certifications for the previous calendar year.

- Section IV. General Conditions. G5 – Semi-Annual Monitoring Report.
(Pursuant to 567 IAC 22.108(5)).

By March 31 and September 30 of each year, the permittee shall submit a report of any monitoring required under this permit for the 6 month periods of July 1 to December 31 and January 1 to June 30, respectively.

- Section IV. General Conditions. G6 – Annual Fee.
(Pursuant to 567 IAC 22.106).

The permittee is required to pay an annual fee based on the total tons of actual emissions of each regulated air pollutant. The operating permit fees will be paid by July 1 of each year. The fee shall be based on emissions for the previous calendar year.

- Section IV. General Conditions. G15 – Permit Deviation Reporting Requirements. (Pursuant to 567 IAC 22.108(5)).

A deviation is any failure to meet a term, condition or applicable requirement in the permit. Unless more frequent deviation reporting is specified in the permit, any other deviation shall be documented in the semi-annual monitoring report and the annual compliance certification.

3. On January 10, 2001, the DNR sent GKN a letter reminding the facility the annual compliance certification for 2000 and the semi-annual monitoring report for the second half of 2000 was due March 31, 2001. GKN failed to submit the annual compliance certification for 2000 and the semi-annual monitoring report for the second half of 2000 by March 31, 2001. On April 23, 2001, DNR issued a Notice of Violation letter to GKN for failing to submit the annual compliance certification for 2000 and the semi-annual monitoring report for the second half of 2000 by March 31, 2001. On May 23, 2001, GKN submitted the annual compliance certification for 2000 and the semi-annual monitoring report for the second half of 2000.

4. GKN failed to submit its semi-annual monitoring report for the first half of 2001 by September 30, 2001. GKN submitted the semi-annual report for the first half of 2001 on October 11, 2001. The report failed to include recordkeeping violations discovered by DNR Field Office 3 on July 3, 2001 and on August 1, 2001. On October 24, 2001, DNR issued a Notice of Violation letter to GKN for failing to timely submit the semi-annual monitoring report for the first half of 2001 and for failing to report all the deviations once the report was submitted.

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5. GKN failed to submit its semi-annual monitoring report for the first half of 2002 by September 30, 2002. On October 29, 2002, DNR issued a Notice of Violation letter to GKN for failing to submit the semi-annual monitoring report for the first half of 2002 by September 30, 2002. On November 11, 2002, GKN submitted the semi-annual monitoring report for the first half of 2002.

6. On April 14, 2003, DNR sent GKN a letter informing the facility that the renewal application for its Title V Operating Permit was due October 18, 2003. On October 2, 2003, DNR telephoned GKN to remind the facility the renewal application for its Title V Operating Permit was due October 18, 2003. GKN failed to submit its Title V Operating Permit renewal application by October 18, 2003. On October 21, 2003, DNR received GKN's Title V Operating Permit renewal application. On October 29, 2003, DNR issued GKN a Notice of Violation letter for failing to submit a timely Title V Operating Permit renewal application.

7. On May 19, 2004, DNR sent GKN a letter notifying the facility of the Title V fee amount for calendar year 2003. The letter reminded the facility that the fee was due no later than July 1, 2004. GKN failed to submit the Title V fee by July 1, 2004. On July 12, 2004, DNR received GKN's Title V fee for calendar year 2003. On July 22, 2004, DNR issued a Notice of Violation letter to GKN for failing to timely submit the Title V fee for calendar year 2003.

8. GKN failed to submit its semi-annual monitoring report for the first half of 2004 by September 30, 2004. On October 30, 2004, DNR received GKN's semi-annual monitoring report for the first half of 2004. On October 14, 2004, DNR issued a Notice of Violation letter to GKN for failing to timely submit the semi-annual monitoring report for the first half of 2004.

9. On August 27, 2007, DNR issued GKN Title V Operating Permit #99-TV-020-R1-M001. The permit contained the same requirements and provisions as the original permit referenced in Paragraph 2 above.

10. On May 14, 2008, DNR sent GKN a letter notifying the facility of the Title V fee amount for calendar year 2007. The letter also reminded the facility that the fee was due no later than July 1, 2009. GKN failed to submit its Title V fees for calendar year 2007 by July 1, 2008. On July 10, 2008, DNR issued a Notice of Violation letter to GKN for failing to timely submit the Title V fees for calendar year 2007. On July 18, 2008, DNR received GKN's Title V fees for calendar year 2007.

11. On April 1, 2009, DNR received GKN's annual compliance certification. GKN failed to include all previous deviations on the certification. GKN failed to include the late Title V fees and subsequent Notice of Violation letter and failed to include its failure to maintain monthly records of paint usage for several emission units. On April 16, 2009, DNR issued a Notice of Violation letter to GKN for failing to report all deviations on the certification. GKN was required to submit a

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revised certification no later than June 30, 2009. DNR received the revised certification on July 28, 2009.

Air Quality Construction Permits

12. GKN has been issued three Notice of Violation letters for air quality construction permit violations since 2002. In June 2002, DNR Field Office 3 conducted an inspection at the GKN facility and discovered several air quality construction permit violations. GKN failed to obtain an air quality construction permit modification prior to changing the type of volatile organic compound (VOC) containing material used in the Stage 1 Paint Line Washer (Emission Point 31, Construction Permit #98-A-1099). GKN exceeded the paint solids content limit of 8.3 pounds per gallon for the Autopainter (Emission Point 05, Construction Permit #92-A-205-S3) for an unknown duration. GKN also exceeded the paint solids content limit of 8.5 pounds per gallon for the Top Coat Booth #1 (Emission Point 06, Construction Permit #92-A-203-S3) and Top Coat Booth #2 (Emission Point 07, Construction Permit #92-A-204-S3) for an unknown duration. On June 24, 2002, DNR Field Office 3 issued a Notice of Violation letter to GKN for the permit violations discovered during the inspection.

13. On March 31, 2003, GKN submitted its annual compliance certification and the certification included several construction permit violations. GKN exceeded the amount of solvent and thinner limit of 3,662 gallons per rolling 12-month period for the Autopainter (Emission Point 05, Construction Permit #92-A-205-S3) for a period of three months. GKN also failed to maintain 12-month rolling sums of paint usage for three months for the Autopainter. GKN also failed to maintain daily recordkeeping for the blanket filter, bag filter, and manometer readings for the Autopainter for a period of four months. GKN failed to maintain daily recordkeeping for the blanket filter, bag filter, and manometer reading for the Top Coat Booth #1 (Emission Point 06, Construction Permit #92-A-203-S3) for a period of four months. GKN also failed to maintain 12-month rolling sums of paint and solvent usage for three months for the Top Coat Booth #1. GKN failed to maintain daily recordkeeping for the blanket filter, bag filter, and manometer readings for the Top Coat Booth #2 (Emission Point 07, Construction Permit #92-A-204-S3) for a period of four months. GKN also failed to maintain 12-month rolling sums of paint and solvent usage for three months for the Top Coat Booth #2. GKN failed to maintain a 12-month rolling sum of the washing detergent for the Stage 1 Paint Line Washer (Emission Point 31, Construction Permit #98-A-1099) for a period of three months. GKN exceeded the VOC content limit of 1.1 pounds per gallon for the E-Coat System (Emission Point 34, Construction Permit #95-A-442-S1) for a period of one year. GKN also failed to maintain 12-month rolling sums of solvent, resin, and paste usage for the E-Coat System for a period of three months. GKN exceeded the VOC content limit of 1.1 pounds per gallon for the E-Coat System (Emission Point 35, Construction Permit 98-A-1120) for a period of one year. GKN also failed to maintain 12-month rolling sums of solvent, resin, and paste usage for the E-Coat System for a period of three months. On July 16, 2003, DNR issued a Notice of

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Violation letter to GKN for the permit condition violations noted in the annual compliance certification.

14. On April 2, 2007, GKN submitted its annual compliance certification and the certification included construction permit violations. GKN exceeded the paint solids content limit of 8.3 pounds per gallon for the Autopainter (Emission Point 05, Construction Permit #92-A-205-S5) for an unknown period of time. GKN exceeded the paint solids content limit of 8.5 pounds per gallon for the Top Coat Booth #1 (Emission Point 06, Construction Permit #92-A-203-S3) for an unknown period of time. On May 9, 2007, DNR issued a Notice of Violation letter to GKN for the permit condition violations noted in the annual compliance certification.

Past History

15. On May 8, 1992, DNR issued Administrative Order No. 92-AQ-25 to GKN for failing to obtain air quality construction permits prior to the installation of eight emission sources. The order did not include a monetary penalty.

16. On March 23, 1999, DNR issued a Notice of Violation letter to GKN for failing to obtain air quality construction permits prior to the installation of ten emission sources. On October 6, 1999, DNR issued Administrative Order No. 1999-AQ-38 to GKN for the permit violations cited in the March 1999 Notice of Violation letter. The order assessed a \$6,000.00 administrative penalty.

17. On December 20, 1999, DNR issued a Notice of Violation letter to GKN for various monitoring and recordkeeping deficiencies discovered during a DNR Field Office 3 inspection on September 23, 1999.

IV. CONCLUSIONS OF LAW

GKN neither admits nor denies the Conclusions of Law and enters into this administrative consent order for settlement purposes only.

1. Iowa Code section 455B.133 provides that the Environmental Protection Commission (Commission) shall establish rules governing the quality of air and emission standards. The Commission has adopted 567 IAC chapters 20-35 relating to air quality.

2. 567 IAC 22.108(9)"a" requires the permittee to comply with all conditions of the Title V Operating Permit. GKN failed to comply with the conditions of its Title V Operating Permit as follows:

- GKN failed to demonstrate compliance with Section IV. General Conditions. G2 – Permit Expiration (Pursuant to 567 IAC 22.105(1)"a") that states the expiration of the permit terminates the permittee's right to operate unless a timely and complete application has been submitted for renewal. Each source

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applying for a renewal of its Title V Operating Permit is required to submit an application at least six months but not more than 18 months prior to the date of the permit expiration. GKN failed to timely submit its Title V Operating Permit renewal application. The application was due October 18, 2003, and DNR received the application on October 21, 2003. The above facts indicate violations of 567 IAC 22.108(9)"a" and 567 IAC 22.105(1)"a".

- GKN failed to demonstrate compliance with Section IV. General Conditions. G4 – Annual Compliance Certification (Pursuant to 567 IAC 22.108(15)"e") requires by March 31 of each year, the permittee shall submit compliance certifications for the previous calendar year. GKN failed to timely submit a compliance certification for calendar year 2000. The above facts indicate violations of 567 IAC 22.108(9)"a" and 567 IAC 22.108(15)"e".

- GKN failed to demonstrate compliance with Section IV. General Conditions. G5 – Semi-Annual Monitoring Report (Pursuant to 567 IAC 22.108(5)) that requires by March 31 and September 30 of each year, the permittee to submit a report of any monitoring required under the permit for the 6 month periods of July 1 to December 31 and January 1 to June 30, respectively. GKN failed to timely submit its semi-annual monitoring report for the following periods: second half of 2000, first half of 2001, first half of 2002, and first half of 2004. The above facts indicate violations of 567 IAC 108(9)"a" and 567 IAC 22.108(5).

- GKN failed to demonstrate compliance with Section IV. General Conditions. G6- Annual Fees (Pursuant to 567 IAC 22.106(3)) that requires a facility to submit annually by March 31 the fees for the previous calendar year. GKN failed to timely submit its yearly fees for the following years: 2003 and 2007. The above facts indicate violations of 567 IAC 22.108(9)"a" and 567 IAC 22.106(3).

- GKN failed to demonstrate compliance with Section IV. General Conditions. G15 – Permit Deviation Reporting Requirements. (Pursuant to 567 IAC 22.108(5)) that states unless more frequent deviation reporting is specified in the permit, any other deviation shall be documented in the semi-annual monitoring report and the annual compliance certification. GKN failed to include all deviations in its semi-annual monitoring report for the first half of 2001 and in its 2008 annual compliance certification. The above facts indicate violations of 567 IAC 22.108(9)"a" and 567 IAC 22.108(5).

3. 567 IAC 22.3(3) provides that a construction permit may be issued subject to conditions which shall be specified in writing. GKN failed to comply with conditions of its air quality construction permits as follows:

- GKN failed to demonstrate compliance with Condition 13 of Construction Permit 98-A-1099 (Emission Point 31, State 1 Paint Line Washer). GKN failed to

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obtain an air quality construction permit modification prior to changing the type of VOC containing material used in the equipment. This violation was discovered by DNR Field Office 3 during an inspection in June 2002.

- GKN failed to demonstrate compliance with Condition 14 of Construction Permit 98-A-1099. Condition 14 required GKN to maintain 12-month rolling sum of washing detergent. GKN failed to maintain a 12-month rolling sum of washing detergent for a period of three months. This violation was noted in the facility's 2002 annual compliance certification.

- GKN failed to demonstrate compliance with Condition 13 of Construction Permit 92-A-203-S3 (Emission Point 06, Top Coat Booth #1). Condition 13 established a paint solids content limit of 8.5 pounds per gallon. GKN exceeded the paint solids content limit for an unknown duration in 2002. This violation was discovered by DNR Field Office 3 during an inspection in June 2002. GKN also exceeded the paint solids content limit for an unknown duration in 2006. This violation was noted in the facility's 2006 annual compliance certification.

- GKN failed to demonstrate compliance with Condition 14 of Construction Permit 92-A-203-S3. Condition 14 required GKN to maintain 12-month rolling sums of paint and solvent usage. GKN failed to maintain 12-month rolling sums of paint and solvent usage for a period of three months. GKN also failed to maintain daily recordkeeping for the blanket filter, bag filter, and manometer for a period of four months. These violations were noted in the facility's 2002 annual compliance certification.

- GKN failed to demonstrate compliance with Condition 13 of Construction Permit 92-A-204-S3 (Emission Point 07, Top Coat Booth #2). Condition 13 establishes a paint solids content limit of 8.5 pounds per gallon. GKN exceeded the paint solids content limit for an unknown duration in 2002. This violation was discovered by DNR Field Office 3 during an inspection in June 2002. GKN also exceeded the paint solids content limit for an unknown duration in 2006. This violation was noted in the facility's 2006 annual compliance certification.

- GKN failed to demonstrate compliance with Condition 14 of Construction Permit 92-A-204-S3. Condition 14 required GKN to maintain 12-month rolling sums of paint and solvent usage. GKN failed to maintain 12-month rolling sums of paint and solvent usage for a period of three months. GKN also failed to maintain daily recordkeeping for the blanket filter, bag filter, and manometer for a period of four months. These violations were noted in the facility's 2002 annual compliance certification.

- GKN failed to demonstrate compliance with Condition 13 of Construction Permit 92-A-205-S3 (Emission Point 05, Autopainter). Condition 13 establishes a paint solids content limit of 8.3 pounds per gallon. GKN exceeded the paint solids content limit for an unknown duration in 2002. This violation was discovered by

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DNR Field Office 3 during an inspection in June 2002. GKN also exceeded the paint solids content limit for an unknown duration in 2006. This violation was noted in the facility's 2006 annual compliance certification. Condition 13 also established a solvent and thinner usage limit of 3,662 gallons per rolling 12-month period. GKN exceeded the solvent and thinner usage limit for a three month period in 2002. This violation was noted in the facility's 2002 annual compliance certification.

- GKN failed to demonstrate compliance with Condition 14 of Construction Permit 92-A-205-S3. Condition 14 required GKN to maintain 12-month rolling sum of paint usage. GKN failed to maintain a 12-month rolling sum of paint usage for a period of three months. GKN also failed to maintain daily recordkeeping for the blanket filter, bag filter, and manometer for a period of four months. These violations were noted in the facility's 2002 annual compliance certification.

- GKN failed to demonstrate compliance with Condition 13 of Construction Permit 95-A-442-S1 (Emission Point 34, E-Coat System). Condition 13 establishes a VOC content limit of 1.1 pounds per gallon. GKN exceeded the VOC content limit for a period of one year. This violation was noted in the facility's 2002 annual compliance certification.

- GKN failed to demonstrate compliance with Condition 14 of Construction Permit 95-A-442-S1. Condition 14 required GKN to maintain 12-month rolling sums of solvent, resin, and paste usage. GKN failed to maintain the 12-month rolling sums of solvent, resin, and paste usage for a period of three months. This violation was noted in the facility's 2002 annual compliance certification.

- GKN failed to demonstrate compliance with Condition 13 of Construction Permit 98-A-1120 (Emission Point 35, E-Coat System). Condition 13 establishes a VOC content limit of 1.1 pounds per gallon. GKN exceeded the VOC content limit for a period of one year. This violation was noted in the facility's 2002 annual compliance certification.

- GKN failed to demonstrate compliance with Condition 14 of Construction Permit 98-A-1120. Condition 14 required GKN to maintain 12-month rolling sums of solvent, resin, and paste usage. GKN failed to maintain the 12-month rolling sums of solvent, resin, and paste usage for a period of three months. This violation was noted in the facility's 2002 annual compliance certification.

V. ORDER

THEREFORE, it is hereby ordered and GKN agrees to do the following:

1. GKN shall pay a penalty of \$8,000.00. \$2,000.00 of the penalty shall be paid to the DNR within 30 days of the date the Director signs this administrative consent order. In lieu of payment of the remaining \$6,000, GKN shall:

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Conduct a Supplemental Environmental Project (SEP). The SEP shall consist of a payment to the Emmet County Conservation Board. GKN shall make a payment of \$6,000.00 to the Emmet County Conservation Board (c/o Eric Anderson, Director; 2303 450th Avenue; Wallingford, Iowa 51365) within 30 days of the date the Director signs this administrative consent order. Once the SEP payment is made, GKN shall submit a receipt of the SEP payment to Kelli Book, attorney for the DNR.

VI. PENALTY

Iowa Code section 455B.146 authorizes the assessment of civil penalties of up to \$10,000.00 per day of violation for the air quality violations involved in this matter. More serious criminal sanctions are also available pursuant to Iowa Code section 455B.146A.

Iowa Code section 455B.109 authorizes the Commission to establish by rule a schedule of civil penalties up to \$10,000.00 that may be assessed administratively. The Commission has adopted this schedule with procedures and criteria for assessment of penalties through 567 IAC chapter 10. Pursuant to this rule, the DNR has determined that the most effective and efficient means of addressing the above-cited violations is the issuance of an administrative consent order with an \$8,000.00 penalty. The administrative penalty assessed by this administrative consent order is determined as follows:

Economic Benefit - 567 IAC chapter 10 requires that the DNR consider the costs saved or likely to be saved by noncompliance. 567 IAC 10.2(1) states that "where the violator received an economic benefit through the violation or by not taking timely compliance or corrective measures, the department shall take enforcement action which includes penalties which at least offset the economic benefit." 567 IAC 10.2(1) further states, "reasonable estimates of economic benefit should be made where clear data are not available." GKN gained an economic benefit in delaying the cost of modifying construction permits in that they delayed the cost of consultants and modeling. Additionally, GKN gained an economic benefit in delaying or avoiding the cost of maintaining the proper records. It is estimated that GKN gained an economic benefit of at least \$1,000.00. Based on the above considerations, \$1,000.00 is assessed for this factor.

Gravity of the Violation - One of the factors to be considered in determining the gravity of a violation is the amount of penalty authorized by the Iowa Code for that type of violation. As indicated above, substantial civil penalties are authorized by statute. Despite the high penalties authorized, the DNR has decided to handle the violations administratively at this time, as the most equitable and efficient means of resolving the matter. On several occasions, GKN operated emission points beyond the permitted limits, thus causing environmental harm to the air quality in the surrounding area. Additionally, timely Title V fees are required to properly

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administer the air programs in the state of Iowa. When the fees are not submitted in a timely manner, DNR's ability to administer the air programs is compromised. GKN's failure to comply with the reporting requirements associated with the Title V and construction permitting sections of the DNR has forced the DNR to expend additional time and resources in an effort to obtain the reports. Thus, these violations threaten the integrity of the DNR's air program. Therefore, \$2,000.00 is assessed for the violations cited in Section IV, Paragraph 2 and \$2,000.00 is assessed for the violations cited in Section IV, Paragraph 3 for a total of \$4,000.00 being assessed for this factor.

Culpability – GKN has a duty to remain knowledgeable of DNR's requirements and to be alert to the probability that its conduct is subject to DNR's rules. GKN is a major Title V source. GKN has facilities in Estherville and Armstrong, with the environmental responsibilities for the facilities being shared. Both facilities have received numerous Notice of Violation letters for air quality violations in the past. GKN has repeatedly committed the same Title V reporting violations and has been repeatedly notified of its failures to submit timely reports. Additionally, GKN has repeatedly violated several air quality construction permit limits. GKN has been issued two previous administrative orders for similar violations as those cited in this administrative consent order. Based on the above considerations, \$3,000.00 is assessed for this factor.


VII. WAIVER OF APPEAL RIGHTS

This administrative consent order is entered into knowingly and with the consent of GKN. For that reason, GKN waives the right to appeal this administrative consent order or any part thereof.

VIII. NONCOMPLIANCE

Compliance with Section V of this administrative consent order constitutes full satisfaction of all requirements pertaining to the violations described in this administrative consent order. Failure to comply with this administrative consent order may result in the imposition of administrative penalties pursuant to an administrative order or referral to the Attorney General to obtain injunctive relief and civil penalties pursuant to Iowa Code sections 455B.146.

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PATRICIA L. BODDY, INTERIM DIRECTOR
Iowa Department of Natural Resources

Dated this 10 day of
December, 2010.



GKN ARMSTRONG WHEELS, INC.

Dated this 18 day of
November, 2010.

Barb Stock (#32-02-004); Kelli Book; Bryan Bunton, Air Quality; DNR Field Office
3; EPA; VII.B.2.d